

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE SCHERING-PLOUGH CORPORATION/ENHANCE SECURITIES LITIGATION	08-CV-397 (DMC) (JAD)
IN RE MERCK & CO., INC., VYTORIN/ZETIA SECURITIES LITIGATION	08-CV-2177 (DMC) (JAD)

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Lead Plaintiffs and Defendants that:

Confidential Witness Discovery

1. The deposition of Nancy Behrens may be taken after the end of fact discovery on August 1, 2011.
2. Defendants will forgo taking the depositions of Scott Barr, Bruce Benounek, David Mariani, Paul Mastoridis, Robert Sages, Jennifer Simier, Mark Strother, and Mark Wright on the condition that Lead Plaintiffs will not call the above-listed individuals as witnesses at trial. Lead Plaintiffs stipulate that they will not do so.
3. Defendants reserve the right to depose any of the individuals listed in paragraph 2 after the end of fact discovery on August 1, 2011, if: (1) the Court orders production of documents relating to "confidential witnesses" that have been withheld from discovery by Lead Plaintiffs, and (2) Defendants determine such deposition(s) to be appropriate in light of the information contained in those documents. Lead Plaintiffs reserve the right to oppose such deposition(s).


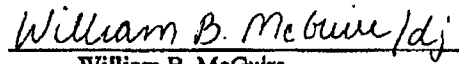
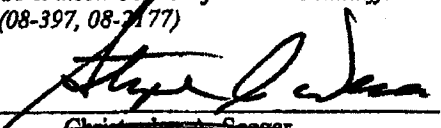

Class Certification Discovery and Briefing




4. In order to avoid duplicative depositions of Lead Plaintiffs' experts, Defendants shall file any opposition(s) to Lead Plaintiffs' motions for class certification in the above-captioned cases on or before October 17, 2011, and Lead Plaintiffs shall produce their class certification experts for deposition between September 15, 2011 and October 7, 2011, as to all subjects for which they have provided expert opinion in these cases.

Pending Interrogatories and Requests for Admission


5. The parties (other than underwriter defendants) shall have until September 14, 2011 to respond to all pending interrogatories and requests for admission.

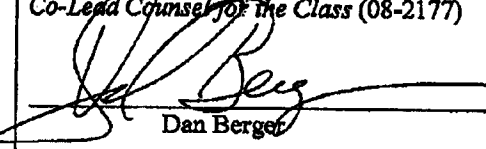
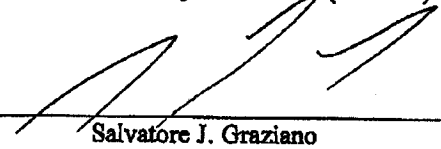
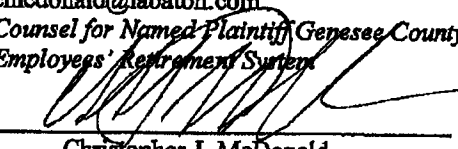
July 14, 2011

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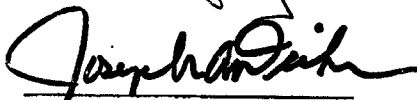
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SO ORDERED,
this 25th day of July, 2011


Joseph A. Dickson
United States Magistrate Judge

<p>jalmeida@gelaw.com <i>Co-Lead Counsel for the Class (08-2177)</i></p>  <p>Dan Berger</p>	<p><i>Attorneys for Merck and Schering-Plough</i></p> <p>Daniel J. Kramer</p>
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